

Exhibit D

From: [Starbuck, Emily](#)
To: [Patrick Trainor, Esq.](#)
Cc: [Mulherin, Joseph](#)
Subject: D'Ambly - Electronic discovery parameters
Date: Friday, December 9, 2022 2:08:50 PM
Attachments: [D'Ambly - Electronic Discovery Parameters - 12.09.22.xlsx](#)

Hi Patrick,

Attached is a spreadsheet with our proposed search terms, custodians, and time period for D'Ambly. Please confirm that this reflects our agreement based on our conversation on Monday. As an update, you should be receiving our first production of documents early next week.

Best,
Emily

EMILY STARBUCK (SHE/HER/HERS)

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Search Terms

Exoo OR Antifashgordon OR @Antifashgordon
D'Ambly
"New Jersey European Heritage Association" OR NJEHA
Doxed OR Doxing OR Dox

Custodians

Jimmy Brill
Ed Bushey
Toni Martinez
Jean Nechvatal
George Martin

Time Period

October 1, 2018 to September 30, 2019